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September 5, 2003

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-116

Dear Ms Dortch:

This is to inform you that on September 4, 2003, Bill Shaughnessy and I met with Eric Einhorn, Cheryl Callahan, and Pamela Slipakoff of the Wireline Competition Bureau's Telecommunications Access Policy Division. The purpose of our meeting was to discuss what effect, if any, there would be upon call routing and rating of a customer's telephone number being ported from BellSouth to a wireless carrier. In our discussion we relied upon the attached diagrams.

During the meeting we also reiterated BellSouth's position that issues relating to *intermodal porting must be resolved prior* to the time that intermodal local number portability obligations attach to wireline and wireless carriers. We also explained that BellSouth already had interconnection agreements with many wireless carriers and that for each of these carriers, BellSouth believes it would be more efficient to include in the associated interconnection agreement the terms and conditions governing intermodal porting between BellSouth and that carrier. When there is no such preexisting interconnection agreement, BellSouth believes that the wireline and wireless carrier should determine the nature of the agreement which best meets their needs.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the record of the proceeding identified above. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathleen B. Levitz", with a stylized flourish at the end.

Kathleen B. Levitz

Attachment

cc: Eric Einhorn
Cheryl Callahan
Pamela Slipakoff

Framework for Discussion

Wireline Notes:

Each ILEC defines its own originating calling area which may encompass multiple rate centers

Wireline LEC obtains NPA/NXX for each rate center.

Wireline calls within a LCA are local.

Wireline calls across LCAs are toll.

LECs may have multiple switches in RC.

Wireless Notes:

Wireless carriers define their LCAs to meet competitive needs.

A CMRS switch serves multiple RCs & LCAs

CMRS providers do not obtain a NXX for each rate center.

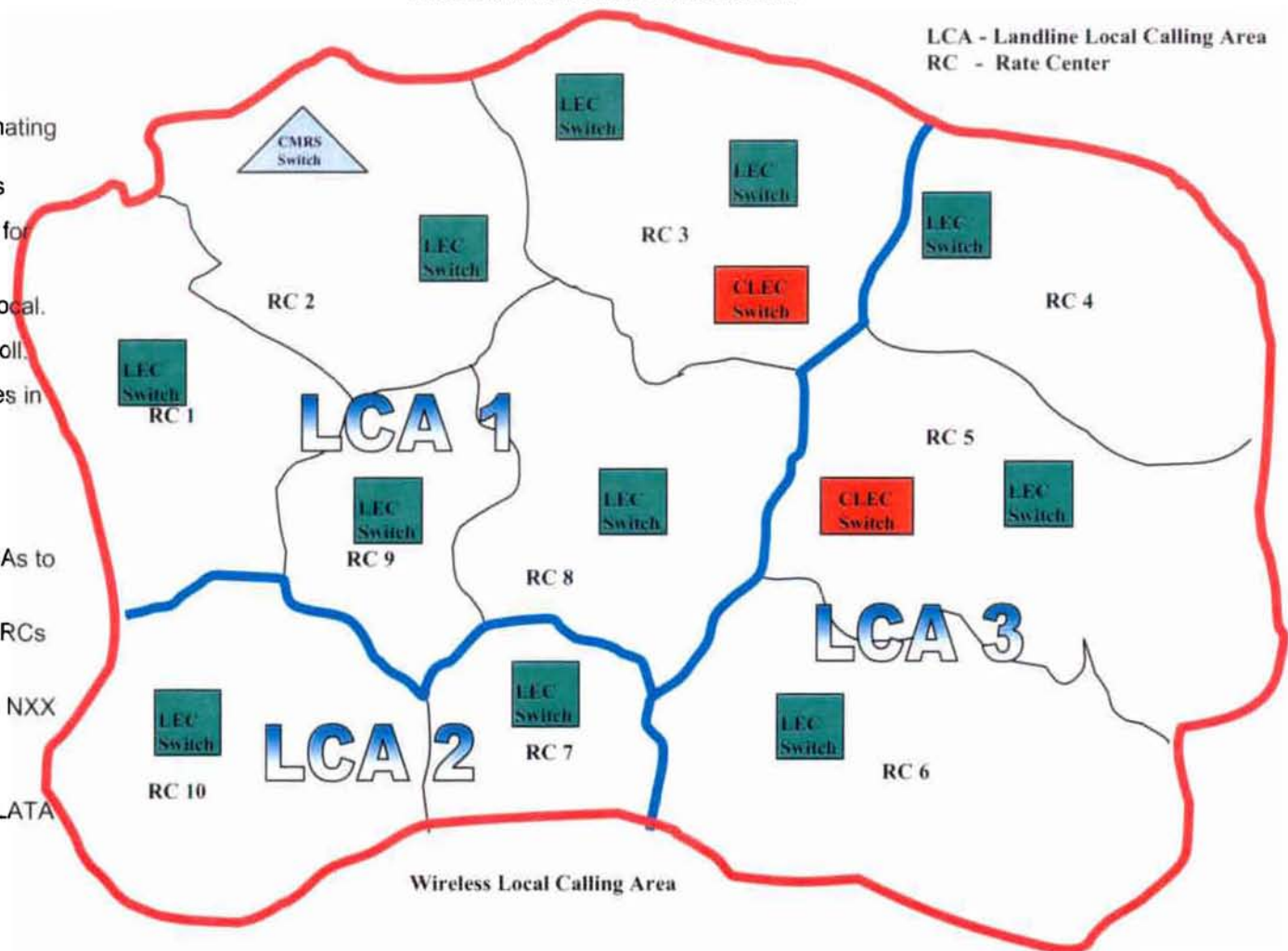
Each wireless carrier has an interconnection point within the LATA for an ILEC to send it traffic.

General Assumption:

Each switch has a unique LRN.

Wireline portability is restricted to the rate center.

BST calls are rated on the NPA-NXX of the dialed call.

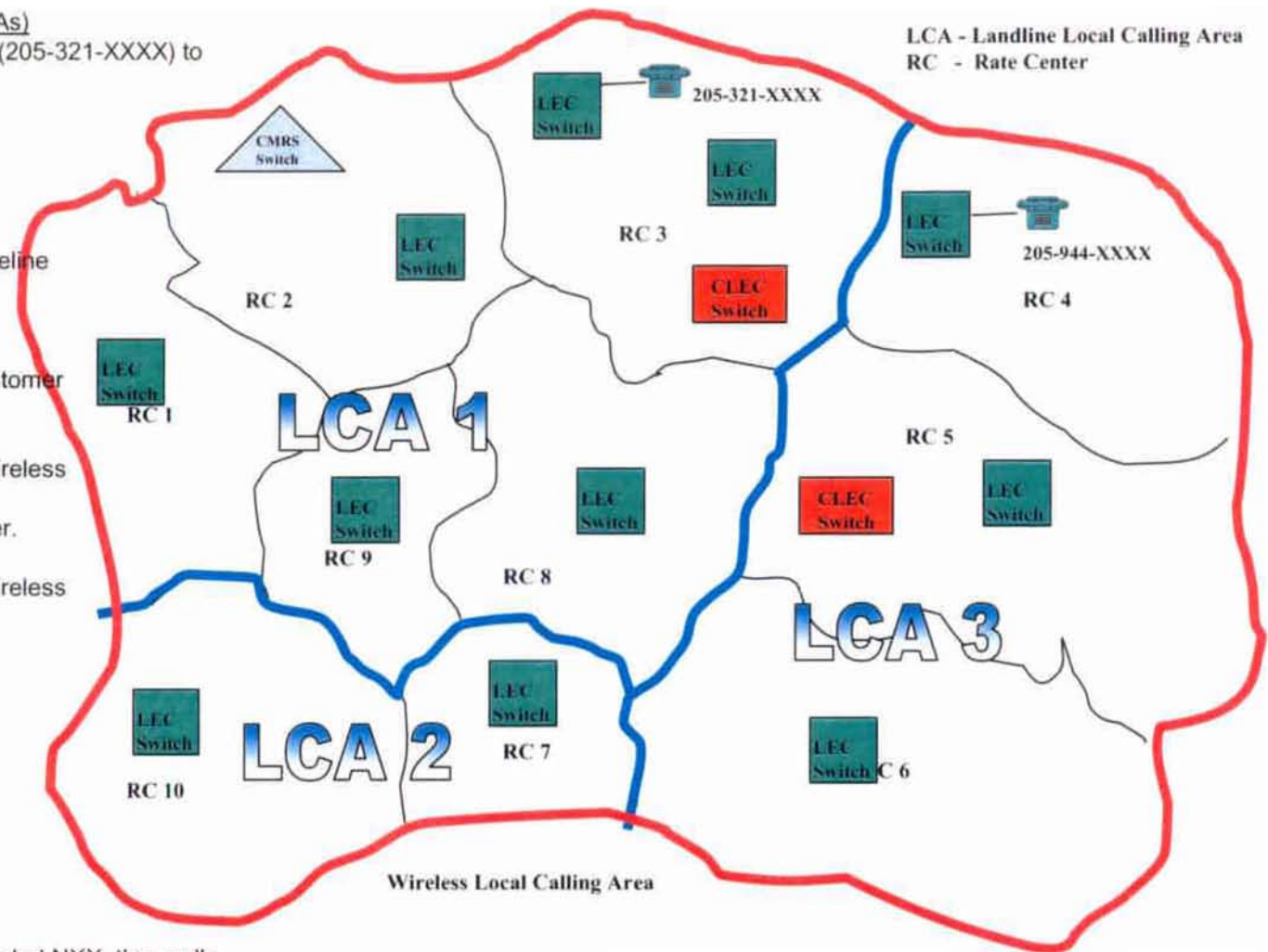


Scenarios #1: (Intra LATA / Intra LCAs)

Wireline customer in RC 3 ports TN (205-321-XXXX) to CMRS provider with Switch in RC2

Calling Scenarios:

1. Wireless customer with ported wireline TN calls wireline customer in RC3.
2. Ported customer calls wireline customer in RC 2.
3. Wireline customer in RC 3 calls wireless customer with ported TN ported (205-321-XXXX) to CMRS provider.
4. Wireline customer in RC 2 calls wireless customer with ported TN ported (205-321-XXXX) to CMRS provider



Notes:

1. If calls are rated based on the dialed NXX, then calls from wireline customers to a former wireline customer are billed based on the dialed digits.
2. It is assumed that calls originated by new wireless customer (ported wireline customer) will be billed according to wireless calling plan.

Scenarios #2: (Intra LATA / Inter LCAs)

Wireline customer in RC 4 ports TN (205-9444-XXXX) to CMRS provider with Switch in RC2

Calling Scenarios:

1. Wireless customer with ported wireline TN calls wireline customer in RC4.
2. Ported customer calls wireline customer in RC 2.
3. Wireline customer in RC4 calls ported TN.
4. Wireline customer in RC2 calls ported TN (205-9441-XXXX).

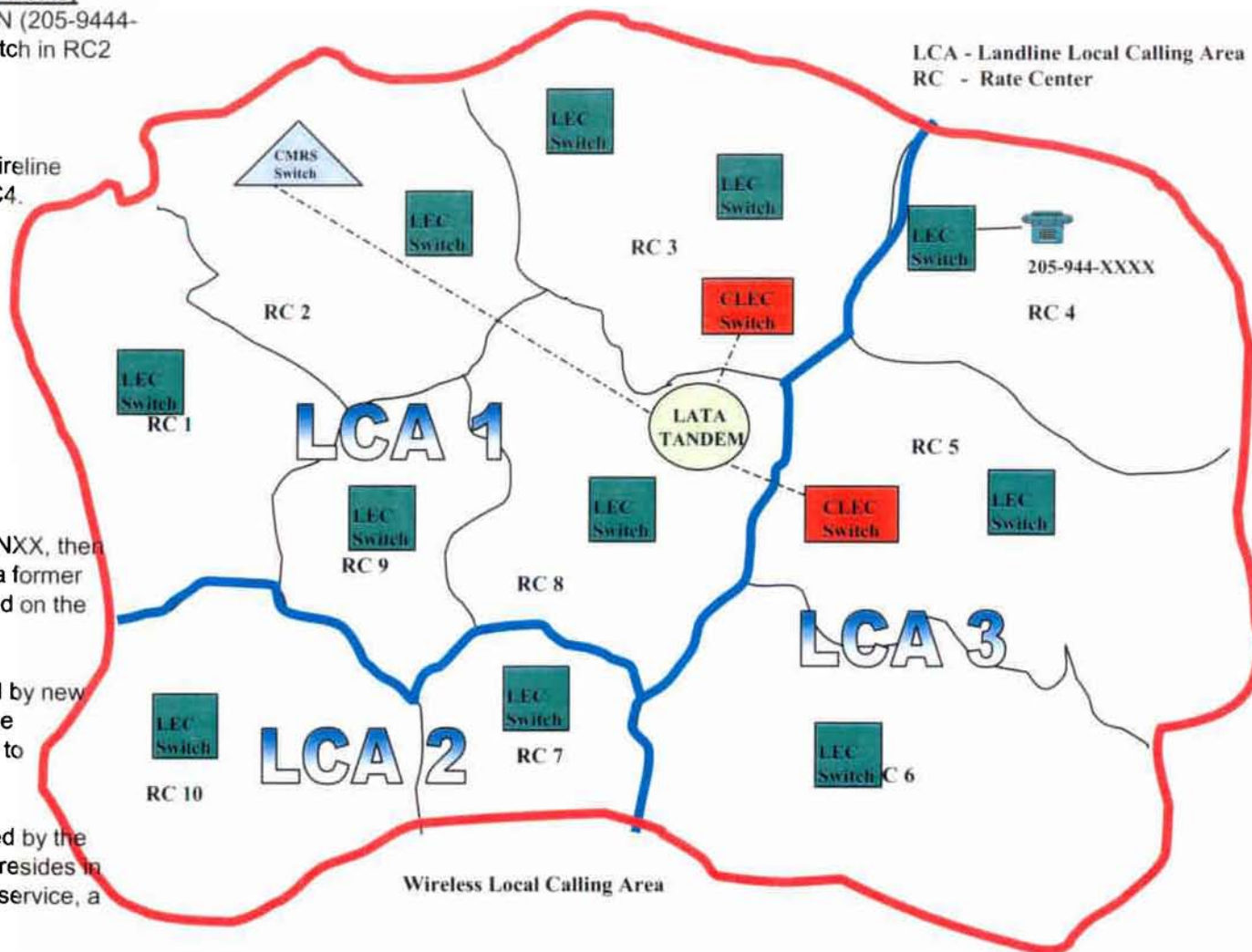
Notes:

1. If calls are rated based on dialed NXX, then calls from wireline customers to a former wireline customer are billed based on the dialed digits
2. It is assumed that calls originated by new wireless customer (ported wireline customer) will be billed according to wireless calling plan.
3. If exiting wireless customer served by the CMRS switch in RC2 physically resides in RC4 and wishes to have wireline service, a number change is required.

Discussion:

A wireline customer who resides in RC 4 ports their TN to the CMRS provider and, after the port, physically moves to RC 2.

Wireline customer in RC2 calls the wireless customer with ported TN (now physically residing in RC2).



Scenarios #3 (Inter LATA / Inter LCAs)

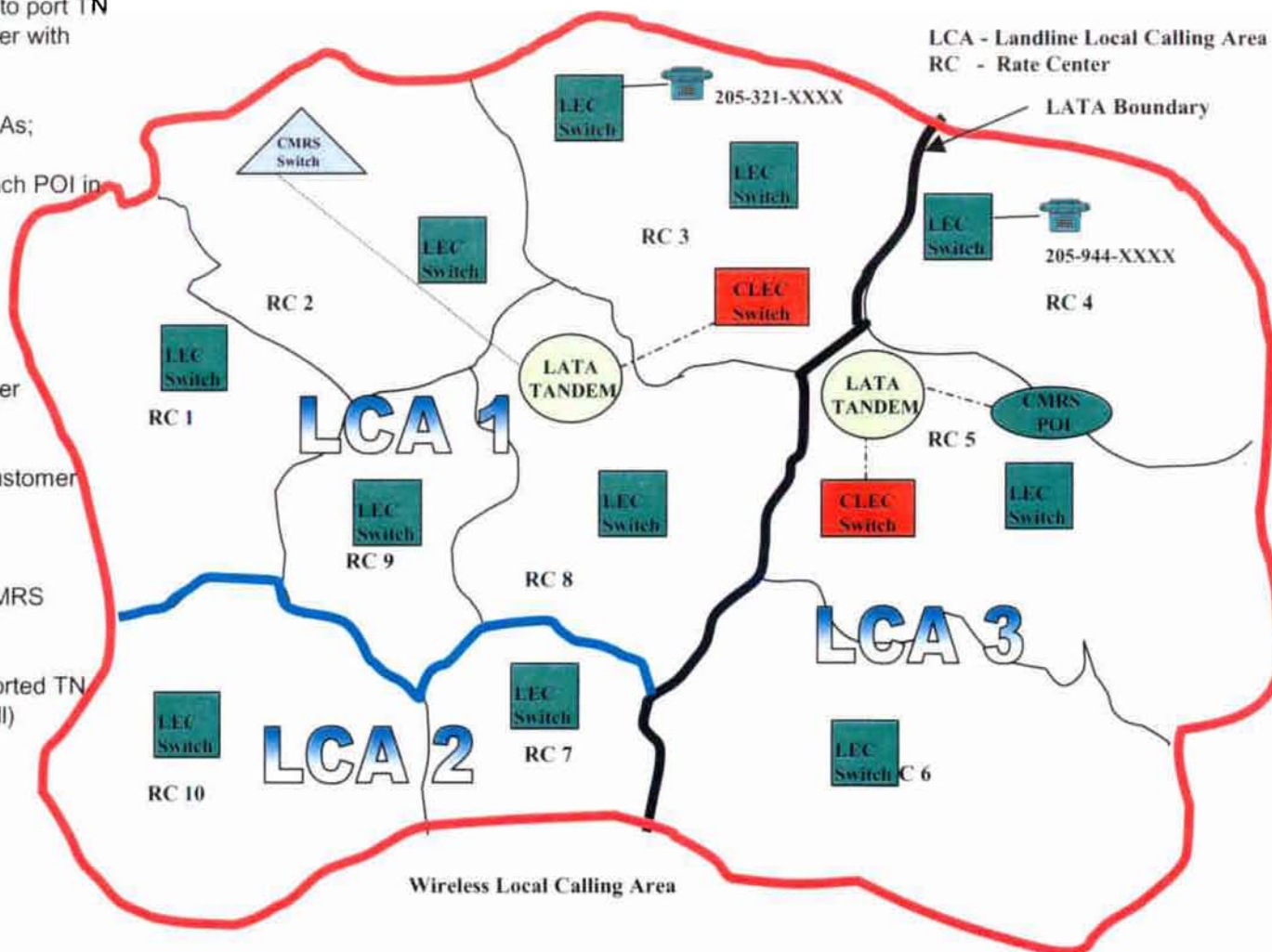
Wireline customer in RC 4 wishes to port TN (205-9444-XXXX) to CMRS provider with Switch in RC2;

CMRS Switch serves multiple LATAs;

CMRS Provider has an LRN for each POI in LATA.

Calling Scenarios:

1. Wireless customer with ported wireline TN calls wireline customer in RC4.
2. Ported customer calls wireline customer in RC 2.
3. Wireline customer in RC4 calls TN ported (205-944-XXXX) to CMRS provider.
4. Wireline customer in RC3 calls ported TN 205-9441-XXXX. (Inter LATA Call) Customer dials 1+ and IXC is responsible for LNP query.



Notes:

1. If calls are rated based on dialed NXX, then calls from wireline customers to a former wireline customer are billed based on the dialed digits
2. It is assumed that calls originated by new wireless customer (ported wireline customer) will be billed according to wireless calling plan.
3. If exiting wireless customer served by the CMRS switch in RC2 physically resides in RC4 and wishes to have wireline service, a number change is required.